

UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Laith Jamil KALASHO

Case: 2:24-mj-30277

Assigned To : Unassigned

Assign. Date : 7/19/2024

Case No. Description: RE: SEALED MATTER
(EOB)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 12/20/2020-1/21/2021, 5/7/2024 in the county of Oakland and elsewhere in the
Eastern District of Michigan, the defendant(s) violated:*Code Section**Offense Description*

18 U.S.C. § 2252A(a)(2)

Receipt and distribution of child pornography

18 U.S.C. § 2252A(a)(5)(B)

Possession of child pornography

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.Sworn to before me and signed in my presence
and/or by reliable electronic means.Date: July 19, 2024City and state: Detroit, Michigan*Complainant's signature*Special Agent Adam Christensen - FBI*Printed name and title**Judge's signature*Hon. David R. Grand, U.S. Magistrate Judge*Printed name and title*

**AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR
A CRIMINAL COMPLAINT AND ARREST WARRANT**

I, Adam Christensen, a Special Agent with the Federal Bureau of Investigation (FBI), being duly sworn, depose and state as follows:

Introduction and Agent Background

1. I have been employed as a Special Agent of the FBI since 2010 and am currently assigned to the Detroit Division. While employed by the FBI, I have investigated federal criminal violations related to child exploitation and child pornography. I have gained experience through training and everyday work relating to conducting investigations. To date, I have either conducted or participated in over 100 child-exploitation investigations. Moreover, I am a federal law enforcement officer who is engaged in enforcing criminal laws, including 18 U.S.C. § 2252A. I am authorized by law to request an arrest warrant.

2. This affidavit is submitted in support of an application for a criminal complaint and arrest warrant for **Laith Jamil Kalasho** for violations of 18 U.S.C. §§ 2252A(a)(2) (receipt and distribution of child pornography) and 2252A(a)(5)(B) (possession of child pornography).

3. The statements contained in this affidavit are based in part on information provided by U.S. law enforcement officers, written reports

about this and other investigations that I have received, directly or indirectly, from other law enforcement agents, information gathered from investigative sources of information, and my experience, training and background as a Special Agent.

4. This affidavit is submitted for the limited purpose of securing an arrest warrant. I have not included every fact I know about this investigation. Instead, I have set forth only the facts that I believe are necessary to establish probable cause that **Kalasho** has violated 18 U.S.C. §§ 2252A(a)(2) and 2252A(a)(5)(B).

Probable Cause

5. On or about May 4, 2024, an FBI Special Agent (SA) assigned to the Philadelphia Division, Alyssa Alliger, informed me she was investigating Individual-1, a person whose identity is known to law enforcement, and who resides in Pennsylvania. During her investigation, she discovered a conversation between Individual-1's Kik account and another Kik user, with username leoj68. Kik is a mobile application based in California which allows users to set up an account and message other users on the service over the Internet, similar to text messaging, but without phone numbers. Kik is therefore a facility of interstate commerce

and because of the locations of the users and Kik, the messages discussed necessarily crossed state lines.

6. The two Kik users had a sexual conversation before user leoj68 transmitted two images and a video that meet the federal definition of child pornography. User leoj68 shared the images on or about December 20, 2020, and the video on or about January 21, 2021, after which leoj68 commented, “You see how did you see how she sucking her brother’s cock[.]”

7. The above video is 53 seconds long and shows a postpubescent female, approximately 13 to 16 years old, performing oral sex on a prepubescent male, approximately nine to 12 years old. For the first half of the video, English-language commercials are audible in the background. At approximately 31 seconds into the video someone says, “Let’s see how hard he is.” The girl then moves back to reveal the erect penis of the boy. The voice says, “Keep going,” and the girl follows the direction. At approximately 41 seconds the voice says, “Prove that you have the handcuffs on” and the girl reveals handcuffs on both of her wrists. The voice then says, “K,” and the girl resumes performing oral sex on the boy.

8. Law enforcement served a subpoena on Kik for subscriber information for Kik user leoj68. On May 3, 2024, Kik provided subscriber information which revealed the user had consistently used the IP address 172.3.67.230 to log into the account between December 12, 2021, and April 28, 2024. The user had also provided a birthdate as XX/XX/1968.

9. Law enforcement made an exigent request for subscriber information on AT&T for subscriber information of IP address 172.3.67.230. On May 4, 2024, AT&T provided the subscriber's address as being a specific address (known to law enforcement) in South Lyon, Michigan. The IP address had been assigned to the account from December 9, 2021, to May 3, 2024.

10. A check of Michigan Department of State records of licensed drivers at the same South Lyon address revealed records for **Laith Jamie Kalasho**, date of birth XX/XX/1968, which matched the date of birth user leoj68 provided to Kik. **Kalasho** has a prior conviction from 2007 for a felony of using the Internet to communicate with another to commit a crime, and a dismissed companion charge that revealed the underlying crime was distribution of child pornography.

11. **Kalasho** registered as a sex offender on August 18, 2011. His registered address with the Michigan Sex Offender Registry is the same South Lyon address that AT&T reported above and the same address that appears on **Kalasho's** driver's license.

12. Based in part on the above information, law enforcement obtained federal search warrants for the residence and person of **Kalasho** and executed them on May 7, 2024. **Kalasho** had already left for work when law enforcement executed the warrant at his residence, but his wife was present. **Kalasho's** wife identified some cellular devices as **Kalasho's** old cellular telephones. Law enforcement executed the search warrant on **Kalasho's** person at his workplace on May 7, 2024, and seized his current cellular telephone, a Samsung SM-S711U. **Kalasho** voluntarily agreed to an interview. During the interview, **Kalasho** identified his Kik accounts as including the username leoj68. He said he had used these accounts to both receive child pornography images and videos from other users and then distribute the child pornography images and videos to other users. He initially reported that he had last logged on to Kik a month ago, but later admitted that he had last logged in more recently: a couple of weeks ago.

13. Data on the cellular devices that were identified as being used by **Kalasho** confirmed that their user had used Kik with Kik's initial installation on the phones as early as August 2019. The devices also show that the username leoj68 was used by the user as a login username. Forensic review of the device revealed 68 unique images that meet the federal definition of child pornography, that is, they displayed minors, most of them prepubescent minors, either displaying their genitals or engaged in sex acts. Some of these images show that they are being viewed on a website, for instance one shows four thumbnails, including one with a finger being inserted into the anus of a prepubescent female, on the website Mega. Mega is a cloud storage provider based in New Zealand.

Conclusion

14. Based on the foregoing, there is probable cause to believe that **Laith Jamil Kalasho** has received and distributed child pornography, in violation of 18 U.S.C. § 2252A(a)(2), and possessed child pornography,

in violation of 18 U.S.C. § 2252A(a)(5)(B), and I respectfully request this Court issue a criminal complaint and arrest warrant for him.

Respectfully submitted,



Adam Christensen, Special Agent
Federal Bureau of Investigation

Sworn to before me and signed in my presence
and/or by reliable electronic means.



HON. DAVID R. GRAND
UNITED STATES MAGISTRATE JUDGE

Date: July 19, 2024